

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
(WILKES-BARRE)**

IN RE:

Daniel P. Errigo, Jr. aka Daniel Errigo, Jr. aka
Daniel P. Errigo aka Daniel Errigo

Cynthia M. Paisley-Errigo aka Cynthia
Paisley-Errigo aka Cynthia Marie Paisley-
Errigo aka Cynthia Errigo

Debtor(s).

CHAPTER 13

CASE NO.: 5:19-bk-00116-MJC

**NOTICE OF ENTRY OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust ("U.S. Bank"), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Angela C. Pattison, Esq.
Hill Wallack LLP
1415 Route 70 East, Suite 309
Cherry Hill, NJ 08034
Telephone: 856-616-8086
Facsimile: 856-616-8081
Email: apattison@hillwallack.com

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 12, 2024

Hill Wallack LLP

By: /s/ Angela C. Pattison

Angela C. Pattison, Esq.

Hill Wallack LLP

1415 Route 70 East, Suite 309

Cherry Hill, NJ 08034

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Counsel to NewRez LLC dba Shellpoint Mortgage
Servicing as servicer for U.S. Bank Trust National
Association, Not In Its Individual Capacity But
Solely As Owner Trustee For VRMTG Asset Trust

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance for NewRez LLC dba Shellpoint Mortgage Servicing as servicer for U.S. Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust in the manner indicated below on April 12, 2024:

Daniel P. Errigo, Jr.
43 Hermel St.
Scott Twp., PA 18447

Cynthia M. Paisley-Errigo
43 Hermel St.
Scott Twp., PA 18447
Debtor
Via Regular Mail

Tullio DeLuca
381 N. 9th Avenue
Scranton, PA 18504
Counsel for Debtor
Via ECF

Office of the Asst. U.S. Trustee
U.S. Courthouse
1501 N. 6th St
Harrisburg, PA 17102
United States Asst. Trustee
Via ECF

Jack N Zaharopoulos
8125 Adams Drive, Suite A
Hummelstown, PA 17036
Chapter 13 Trustee
Via ECF

By: /s/ Angela C. Pattison
Angela C. Pattison, Esq.,
Attorney ID 307611
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